

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	CRIMINAL NO.
v.	:	DATE FILED:
RAPHAEL SHAW	:	VIOLATIONS:
XAVIER NOLLEY-HALL	:	18 U.S.C. § 2113(a) (entering a bank with
	:	intent to commit a felony – 1 count)
	:	18 U.S.C. § 2113(b) (taking and carrying
	:	away more than \$1,000 from a bank – 1
	:	count)
	:	18 U.S.C. § 1001(a)(2) (making a false
	:	statement to a federal agency – 1 count)
	:	18 U.S.C. § 2 (aiding and abetting)
		Notice of Forfeiture

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

On or about May 31, 2020, in Philadelphia, in the Eastern District of
Pennsylvania, defendants

**RAPHAEL SHAW and
XAVIER NOLLEY-HALL**

entered and attempted to enter the Wells Fargo Bank, located at 1575 North 52nd Street in
Philadelphia, Pennsylvania, the deposits of which were insured by the Federal Deposit Insurance
Corporation, with the intent to commit a felony affecting such bank therein.

All in violation of Title 18, United States Code, Section 2113(a).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about May 31, 2020, in Philadelphia, in the Eastern District of Pennsylvania, defendant

RAPHAEL SHAW,

together with other persons unknown to the grand jury, took and carried away with intent to steal and purloin, and aided and abetted such taking and carrying away of, more than \$1,000 belonging to, and in the care, custody, control, management, and possession of, the Wells Fargo Bank, located at 1575 North 52nd Street in Philadelphia, Pennsylvania, the deposits of which were insured by the Federal Deposit Insurance Corporation.

All in violation of Title 18, United States Code, Sections 2113(b) and 2.

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 19, 2020, and July 10, 2020, in Philadelphia, in the Eastern District of Pennsylvania, defendant

XAVIER NOLLEY-HALL,

in a matter within the jurisdiction of the Federal Bureau of Investigation, an agency of the executive branch of the United States, knowingly and willfully made materially false, fictitious, and fraudulent statements and representations, in that defendant NOLLEY-HALL denied knowing defendant Raphael SHAW, when in fact the defendant knew defendant SHAW.

In violation of Title 18, United States Code, Section 1001(a)(2).

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

1. As a result of the violation of Title 18, United States Code, Section 2113(b), set forth in this indictment, defendant

RAPHAEL SHAW

shall forfeit to the United States of America any property, real or personal, that constitutes or is derived from proceeds traceable to the commission of such violation, including, but not limited to, the sum of \$104,000.

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 28, United States Code, Section 2461(c), to


seek forfeiture of any other property of the defendant up to the value of the property subject to forfeiture.

All pursuant to Title 28, United States Code, Section 2461(c) and Title 18, United States Code, Section 981(a)(1)(C).

A TRUE BILL:



GRAND JURY FOREPERSON

for 
WILLIAM M. McSWAIN
United States Attorney

No. _____

UNITED STATES DISTRICT COURT

Eastern District of Pennsylvania

Criminal Division

THE UNITED STATES OF AMERICA


vs.

**RAPHAEL SHAW
XAVIER NOLLEY-HALL**

INDICTMENT

Counts

18 U.S.C. § 2113(a) (entering a bank with intent to commit a felony – 1 count)
18 U.S.C. § 2113(b) (taking and carrying away more than \$1,000 from a bank – 1 count) 18 U.S.C. § 1001(a)(2) (making a false statement to
a federal agency – 1 count) 18 U.S.C. § 2 (aiding and abetting) Notice of forfeiture


Foreman

Filed in open court this _____ day,
Of _____ A.D. 20 _____

Clerk

Bail, \$ _____
